

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION  
CASE NUMBER: 3:23-cv-05393-MGL**

Dominique B. Lovejoy,

Plaintiff,

v.

Jason L. Richardson, Rocket Expediting, LLC,  
Super Ego Holdings, LLC, Super Ego  
Logistics, LLC, Stefan Perovic, and Sendmee  
Trucking, LLC,

Defendants.

**DEFENDANTS' ANSWERS TO LOCAL  
RULE 26.03 INTERROGATORIES**

**TO: THE UNITED STATES DISTRICT COURT:**

Pursuant to Local Rule 26.03, the following is included in the Fed. R. Civ. P. 26(f) report:

1. A short statement of the facts of the case;

**RESPONSE: On April 10, 2023, Defendant Jason Lee Richardson was operating a tractor-trailer on Interstate 26 in Richland County, South Carolina when he collided with Plaintiff. As a result of the collision, Plaintiff Dominique B. Lovejoy claims she was injured and has received and continues to receive medical treatment to address her claimed injuries. Defendants have denied liability for the collision and deny causation for Plaintiff's claimed injuries.**

2. The names of fact witnesses likely to be called by the Defendant and a brief summary of their expected testimony;

**RESPONSE:**

- a. **Dominique Lovejoy  
142 Quigley Court  
Lexington, SC 29073**

**Ms. Lovejoy is the Plaintiff in this matter and would testify regarding the circumstances of this accident.**

- b. **Jason Lee Richardson  
1945 Dooertown Road  
Cordova, AL 35550**

**Jason Lee Richardson is a Defendant in this action. He is expected to testify to the facts and circumstances surrounding the collision that is the subject of this lawsuit. He is also expected to testify as to his relationship with the other Defendants.**

- c. Representative(s) of Rocket Expediting, LLC  
2939 Kenny Road, Suite 220  
Columbus, OH 43221  
(402) 282-8443**

**Rocket Expediting, LLC is a Defendant in this action. It is anticipated that corporate representatives may be named to provide testimony on behalf of Rocket Expediting regarding, among other things, the relationship between all listed Defendants.**

- d. Representative(s) of Super Ego Holdings, LLC  
621 Busse Road, Suite 240  
Bensenville, IL 60106  
(603) 506-8869**

**Super Ego Holdings, LLC is a Defendant in this action. It is anticipated that corporate representatives may be named to provide testimony on behalf of Super Ego Holdings regarding, among other things, the relationship between all listed Defendants.**

- e. Representative(s) of Super Ego Logistics, LLC  
677 N. Larch Avenue  
Elmhurst, IL 60126  
(312) 796-6668**

**Super Ego Logistics, LLC is a Defendant in this action. It is anticipated that corporate representatives may be named to provide testimony on behalf of Super Ego Logistics regarding, among other things, the relationship between all listed Defendants.**

- f. Stefan Perovic  
175 N. Harbor Drive, Apt. 1715  
Chicago, IL 60601**

**Stefan Perovic is a Defendant in this action, and may, separately or in combination with other listed Defendants, own the tractor and/or trailer that was involved in the collision giving rise to this litigation. Defendant Perovic is expected to testify to, among other things, his relationship with the other listed Defendants as well as his knowledge of the facts and circumstances of the collision that is the subject of this lawsuit.**

- g. Representative(s) of SendMee Trucking, LLC  
1945 Doovertown Road  
Cordova, AL 35550**

**SendMee Trucking, LLC is a Defendant in this action. It is anticipated that corporate representatives may be named to provide testimony on behalf of SendMee regarding, among other things, the relationship between all listed Defendants, Defendant Richardson's operating authority, SendMee Trucking's safety and training practices, Defendant Richardson's compliance with and enforcement of various state and federal safety regulations.**

**h. Trooper J.R. Hutcherson  
South Carolina Highway Patrol**

**Trooper Hutcherson is listed as the individual who conducted the investigation into the collision behalf of the South Carolina Highway Patrol and was involved in the preparation of the South Carolina Traffic Collision report. He is expected to testify regarding his investigation of the collision.**

**i. Any and all witnesses, including medical/mental health providers and records custodian of medical providers, listed or disclosed by the Plaintiff.**

**Defendants reserve the right to supplement the answer to this Interrogatory in the future.**

3. The names and subject matter of expert witnesses (if no witnesses have been identified, the subject matters and field of expertise should be given as to experts likely to be offered);

**RESPONSE: No expert witnesses have been identified. Defendants reserve the right to supplement the answer to this Interrogatory in the future.**

4. A summary of the claims or defenses with statutory and/or case citations supporting the same;

**RESPONSE: The Defendants deny they are liable for the accident giving rise to this lawsuit. The Defendants deny the incident was the proximate cause of Plaintiff's alleged injuries.**

5. Absent special instructions from the assigned judge, the parties shall propose dates for the following deadlines listed in Local Rule 16.02:

- (a) Exchange of Fed. R. Civ. P. 26(a)(2) expert disclosures; and
- (b) Completion of Discovery

**RESPONSE: The parties agree to the deadlines set forth in the Proposed Amended Conference and Scheduling Order.**

6. The parties shall inform the Court whether there are any special circumstances which would affect the time frames applied in preparing the scheduling order.

**RESPONSE: N/A.**

7. The parties shall provide any additional information requested in the Pre-Scheduling Order (Local Rule 16.01) or otherwise requested by the assigned judge.

**RESPONSE: N/A.**

MURPHY & GRANTLAND, P.A.

*s/Crawford A. Krebs*

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*Attorneys for Defendants*

Columbia, South Carolina  
December 1, 2023